

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
JACKSON DIVISION

BREANA SCHENK, as next
best friend to Ev M,
Em M, and El M and the ESTATE OF
KELSEY DELYLAH SCHENK-McKEE,
Plaintiff,

vs.

No. 1:22-cv-01268-STA-jay

PAUL A. THOMAS, GIBSON COUNTY
SHERIFF; and DANNY LEWIS, Chief Deputy
Gibson County Sheriff's Department and TAMELA
DENISE COX, Chief Jailor/Correction Officer of the
Gibson County Sheriff's Department and
WILLIAM HOLBROOK, Deputy/Correction Officer and
JAILER CODY PRINCE, JAILER JACOB LITRELL,
JAILER BRANDY HILL, JAILER WILLIAM MORGAN,
JAILER JORDAN STURDIVANT, JAILER PHILIP
WATSON, JAILER STEVEN GILLES, JAILER ROBIN
MEESE, JAILER PATRICIA MCCARTNEY, JAILER
BELETHA J. YARBROUGH, JAILER JONATHAN
KEEL, JAILER LANEL PALMER, JAILER CORDALE J. DANCE,
JAILER DAVID ABRAHAM, JAILER MICHAEL MCMINN,
JAILER ERIC BAILEY, and GIBSON COUNTY, TENNESSEE.
Defendants.

MOTION AND MEMORANDUM FOR EXTENSION OF TIME

Comes now the Plaintiff, by and through her attorney, and moves the court, pursuant to the Federal Rules of Civil Procedure , to grant an extension of time of eighteen (18) days to respond to Defendant's Motion to Dismiss. For grounds, Plaintiff's attorney would state he has been in trials and mediations since the filing of said Motion on May 1, 2023. Plaintiff has contacted defense counsel and was advised they have no objection.

Wherefore Plaintiff moves that Plaintiff be granted a eighteen (18) day extension until

June 16, 2023 in which to respond.

Respectfully Submitted,
/s/ Robert T. Keeton III
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Certificate of Consultation

I certify that I consulted defense counsel and that they had no objection.

/s/ Robert T. Keeton III
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Certificate of Service

The undersigned hereby certificate that a true and correct copy of the foregoing document was served via the U.S. District Court ECF system upon:

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